

EDELSTEIN & GROSSMAN

Attorney at Law
501 Fifth Avenue, Suite 514
New York, NY 10017
Tel: (212) 871-0571
Fax: (212) 922-2906
jonathan.edelstein.2@gmail.com

Gran Kool.
Jonas Edelstein
12/8/23

December 4, 2023

Hon. Denise L. Cote, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: U.S. v. Mahmoud Thiam, Docket No. 17-CR-47 (DLC)

Your Honor:

I respectfully write to request permission for defendant Mahmoud Thiam to travel to Dakar, Senegal, between December 15, 2023 and January 10, 2024. The purpose of this visit is to be with his 80-year-old mother, Fadim Thiam, who will be in Dakar during that period for medical checkups and treatment, and who has requested Mr. Thiam's presence along with the presence of his children and grandchildren.

As the Court will recall, Mr. Thiam previously visited his mother in France in September-October 2022 without incident. She remains in poor health and would like to spend as much time with him as possible. Mr. Thiam is now nearly two years into his three-year period of supervised release and has complied with all conditions.

In Senegal, Mr. Thiam will stay with his friends Habib and Alisa Diouf, whose address is Avenue Roosevelt, Boite postale 6743, Dakar - Plateau. He will not incur any lodging expenses. His daughters will stay with their maternal grandmother, also without incurring expenses.

Mrs. Thiam's medical appointments were made by phone; however, a note confirming her neurological appointment with Dr. Ale Thiam (no relation) at Clinique Rhama in Dakar is attached.

The undersigned has attempted to obtain the government's position on this request; however, AUSAs Elisha Kobre and Christopher DiMase, who previously handled this case, are no longer with the United States Attorney's office. The undersigned called the main number for the US Attorney, spoke with the clerks at the front office, and left a message as directed asking

who was the current point of contact for this case. However, the undersigned has not heard back from that message and has hence been unable to ascertain the opinion of the government.

The Court's consideration in this matter is appreciated.

Respectfully submitted,

/s/ Jonathan I. Edelstein

Jonathan Edelstein

Cc: All Counsel (Via ECF)